Message

From: Susan Schow [schow29@comcast.net]

Sent: 1/18/2018 4:54:06 PM

To: Beeler, Cindy [Beeler.Cindy@epa.gov]; 'Scheehle, Elizabeth@ARB' [Elizabeth.Scheehle@arb.ca.gov]

CC: timakirataylor@live.com [timothya.taylor@state.co.us]; james jarrett [james.f.jarrett@wv.gov]; 'Dorman, Lisa'

[ldorman@pa.gov]

Subject: FW: Methane Team: Punch List and Edits for External Review

Attachments: Equistar AMOC-6 final 14515.pdf; METHANE Regulatory 1 18 18-JFJ TT edits.docx

Importance: High

Cindy and Elizabeth,

Just wanted to share with you these last edits (starting on page 12) to the Regulations section by James Jarrett (see attached). We are really trying to keep this review about previous edits (confirming all correct) but he had some good new revisions to the intro text and just wanted to get your buy-in before finalizing.

Can you expedite any responses?

I need to lock-down changes and finalize asap to work on references.

Thanks, Susan

From: Jarrett, James F [mailto:James.F.Jarrett@wv.gov]

Sent: Thursday, January 18, 2018 10:41 AM

To: Susan Schow <schow29@comcast.net>; 'Taylor - CDPHE, Timothy' <timothya.taylor@state.co.us>

Cc: 'Dorman, Lisa' <ldorman@pa.gov>

Subject: RE: Methane Team: Punch List and Edits for External Review

Sure. Here are 2 links about AMOC-6 for use of an infrared camera in place of a analyzer for difficult-to-monitor LDAR components. Attached is additional information if needed.

https://webmail.tceq.texas.gov/gw/webpub/7c129ba5f85e97c24ceb511d636bc88caddb0cc/GWDOC/DREF/tnrdom3.dms3apo.ansrp01/556427/Official/HTML/GWContentRoot?action=Document.View&merge=fileview&bNoRefresh=1&Item.Attachment.filename=TRV+%2d+9423%2c+N202+EQUISTAR+CHEMICALS+LP+%5bAMENDMENT+NONATTAINMENT+212204%2c+212476%5d&User.context=7c129ba5f85e97c24ceb511d636bc88caddb0cc&Item.Attachment.type=Document&Item.Attachment.Library.id=tnrdom3.dms3apo.ansrp01&Item.Attachment.Document.id=556427&Item.Attachment.Document.version=Official&Item.Attachment.allowViewNative=1

https://webmail.tceq.texas.gov/gw/webpub/d3a3e26963f150a898f1fc89879ac44edca93/GWDOC/DREF/tnrdom3.dms3apo.aopdp95a-

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 $\underline{new\<em.Attachment.Document.id=77006\<em.Attachment.Document.version=Official\<em.Attachment.allowView}\\ Native=1$

From: Susan Schow [mailto:schow29@comcast.net]

Sent: Thursday, January 18, 2018 9:35 AM

To: 'Taylor - CDPHE, Timothy' < timothya.taylor@state.co.us>; Jarrett, James F < James.F.Jarrett@wv.gov>

Cc: 'Dorman, Lisa' < ldorman@pa.gov>

Subject: RE: Methane Team: Punch List and Edits for External Review

Thanks James and Tim,

Do I need to share with Cindy Beeler (and/or Elizabeth) to get feedback since they wrote much of this.

If James can provide the citation to the AMOC #6 on pg 20 as Tim noted, I will be happy to forward to Cindy.

BTW -- the ITRC style guide requires Table numbering consecutively from the front of the document so will be correct at time of submission (Table 2 is 2nd table in document now). Also, don't worry about formatting since Table headers will be put in last thing because pages continue to move.

Thanks! Susan

Susan Schow, MPH
ITRC Methane Team - Program Advisor
Schow29@comcast.net
207-841-0534

From: Taylor - CDPHE, Timothy [mailto:timothya.taylor@state.co.us]

Sent: Wednesday, January 17, 2018 4:12 PM **To:** Jarrett, James F < James.F.Jarrett@wv.gov>

Cc: Susan Schow < schow29@comcast.net; Dorman, Lisa < ldorman@pa.gov>

Subject: Re: Methane Team: Punch List and Edits for External Review

Thanks James. I made some modifications to the language you added on page 19 (see attached). I tried to organize it in a way that flowed with the entire paragraph.

Can you please provide a reference for Texas' AMOC-6? I was unable to locate one online.

Tim

On Wed, Jan 17, 2018 at 7:14 AM, Jarrett, James F < <u>James.F.Jarrett@wv.gov</u>> wrote:

Sorry I attached the old version.

From: Jarrett, James F

Sent: Wednesday, January 17, 2018 8:59 AM

To: 'Taylor - CDPHE, Timothy' < timothya.taylor@state.co.us>

Cc: Susan Schow <schow29@comcast.net>; Dorman, Lisa <ldorman@pa.gov>

Subject: RE: Methane Team: Punch List and Edits for External Review

Thanks. I added some things to Page 19 to clarify OGI monitoring protocol. See attached.

From: Taylor - CDPHE, Timothy [mailto:timothya.taylor@state.co.us] Sent: Tuesday, January 16, 2018 7:08 PM To: Jarrett, James F < James.F.Jarrett@wv.gov>
Cc: Susan Schow < schow29@comcast.net ; Dorman, Lisa ldorman@pa.gov Subject: Re: Methane Team: Punch List and Edits for External Review
Subject: Re: Methane Team: Punch List and Edits for External Review
James,
The punch list items are the priority but the intention is to review the entire document for any errors or inconsistencies so we appreciate you doing that for the Regulations section.
I made one edit based on your comment on page 18 that hopefully addresses your point (see attached document and let me know what you think) and agree with all your other comments and proposed edits.
However, can you please clarify your comment on page 19? In essence, is there an OGI monitoring protocol from EPA? If so, we'll want to clarify that sentence to reflect that. Would you mind taking a stab at updating that sentence if need be? Thanks.
Tim
On Tue, Jan 16, 2018 at 9:48 AM, Jarrett, James F < <u>James.F.Jarrett@wv.gov</u> > wrote:
I know you are looking for the punch list items, but I noticed a few things in the regulation section. My suggested revisions are attached for consideration in red text.
For example:
-NSPS OOOOa covers Gas Processing Plants so I checked it in the tables.
From: Susan Schow [mailto:schow29@comcast.net] Sent: Monday, January 15, 2018 4:11 PM
To: ryou.minegishi@konicaminolta.com; vivien.lecoustre@hq.doe.gov; sidhuffman@cox.net; cesar.alfaro@bsee.gov;
y.ariel@bluefield.co; j.atkinson@bluefield.co; dbacon@utah.gov; barbery.andrea@epa.gov; beeler.cindy@epa.gov; nabhatt@pa.gov; jbinder@burnsmcd.com; dburge@environcorp.com; anna.h.butler@usace.army.mil;

 $\underline{Lindsay.Campbell@aer.ca;\ ncezar@ndce.ca;\ chattopadhyay.sandip@epa.gov;\ lance.e.christensen@jpl.nasa.gov;}$

achristensen@burnsmcd.com; cclavin@ida.org; jcollins3@mt.gov; cramer@adeq.state.ar.us;

bdeering@gesonline.com; steve@kairosaerospace.com; dewees.jason@epa.gov; ldorman@pa.gov; don.dsouza@gov.bc.ca; roopa.ganapathy@canada.ca; ag5@azdeq.gov; nathaniel.gorence@hq.doe.gov; matt.harrison@aecom.com; jhegland@methanealliance.ca; jorn.herner@arb.ca.gov; kaylie.holland@alaska.gov; geojimj@gmail.com; Jarrett, James F < lames.F.Jarrett@wv.gov>; yaomin.jin@gov.bc.ca; kelly.kaletsky@epa.ohio.gov; hisanori.kawashima@konicaminolta.com; mkhan@desu.edu; christopher.konek@hq.doe.gov; kitty.kong@chevron.com; kopero@battelle.org; placey@aga.org; TRAVIS.B.LEWIS@NAVY.MIL; edward.long1@navy.mil; dlyon@edf.org; angela.marconi@state.de.us; smarlb3@gmail.com; amckittr@ida.org; adam.miller@nd.gov; ryou.minegishi@konicaminolta.com; Irene.Montero@bp.com; mmurphy262@comcast.net; anowlan@edf.org; craig.oneill@flir.com; ona.papageorgiou@dec.ny.gov; mpatil@langan.com; sreinis@langan.com; sdrichardson@gsi-net.com; j.rutherford@heathus.com; escheehl@arb.ca.gov; schow29@comcast.net; sanjay.shah@dep.nj.gov; bashman@earthlink.net; nsihota@chevron.com; kevin.speicher@dps.ny.gov; dspicuzza@woodardcurran.com; petestrauss1@comcast.net; skstuver@gsi-net.com; rsur86@gmail.com; timothya.taylor@state.co.us; ouppal@langan.com; laura@kairosaerospace.com; zhongmaosheng@126.com Subject: Methane Team: Punch List and Edits for External Review
Methane Team Members,
I have updated the draft Methane document with the most current text (including David's last draft and the ITRC promised edits including populating Table 5). I have posted for your use.
We are conducting calls this week to finalize the text (addressing final comments) and I am also trying to incorporate all the great figures and graphics you have been submitting for our use since our Team call – THANKS!
It is important to coordinate changes so we don't have multiple versions being editing simultaneously.
If you insert any edits directly within the document, please <u>post the revised version of the document with the new</u> date and your initials and/or send directly to me for posting asap.
We are only fixing items as noted in the punch list (see previous emails) or reviewing the document to ensure previous comments/edits have been incorporated.
All comments, edits, and source citation information submitted to Susan no later than COB Monday, January 22 nd .
See the document at our Team webpage:
https://www.itrcweb.org/Team/Private?teamID=77

under:

Evaluation of Innovative Methane Detection Technologies > <u>Document Drafts</u>
It is called "METHANE_Prelim_External_Draft_ITRC_1_15_18.docx"
Under our SharePoint website folder:
https://itrcweb.sharepoint.com/Methane/Forms/AllItems.aspx
It is also posted here at this link on SharePoint:
https://itrcweb.sharepoint.com/_layouts/15/guestaccess.aspx?docid=1791bcfc3c7c74d7fae4fa6c02e0eb653&authkey =AesJkQ9Ak46xHV_syium8-8&e=qm8Ll7
I will keep you posted on our progress.
Thank you,
Susan
Susan Schow, MPH
ITRC Methane Team - Program Advisor
Schow29@comcast.net
<u>207-841-0534</u>
Timothy Taylor IR Camera Inspection Program Work Lead Oil & Gas Team

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Are you curious about ground-level ozone in Colorado? Visit our ozone webpage to learn more.		
Timothy Taylor IR Camera Inspection Program Work Lead Oil & Gas Team		
4300 Cherry Creek Drive South, Denver, CO 80246-	1530	

office: 303-692-3173| mobile: 303-332-5769| fax: 303-782-0278

email: timothya.taylor@state.co.us | www.colorado.gov/cdphe/apcd

Are you curious about ground-level ozone in Colorado? Visit our ozone webpage to learn more.